

**July Quarterly
Candidate Reporting**

June 22, 2016
1:00 – 2:30 p.m.

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Objectives

- ▣ **Review reporting schedule for 2016 and the importance of timely filing**
- ▣ Evaluate common reporting errors and disclosure scenarios
- ▣ Learn about the review of reports and responding to Requests for Additional Information
- ▣ Discuss best practices for reporting and compliance



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2016 Quarterly Reporting Schedule

Reports	Coverage Dates	Due Date
April Quarterly	01/01/2016 – 03/31/2016	04/15/2016
July Quarterly	04/01/2016 – 06/30/2016	07/15/2016
October Quarterly	07/01/2016 – 09/30/2016	10/15/2016
Pre-General	10/1/2016 – 10/19/2016	10/27/2016
Post-General	10/20/2016 – 11/28/2016	12/8/2016
Year-End	11/29/2016 – 12/31/2016	01/31/2017



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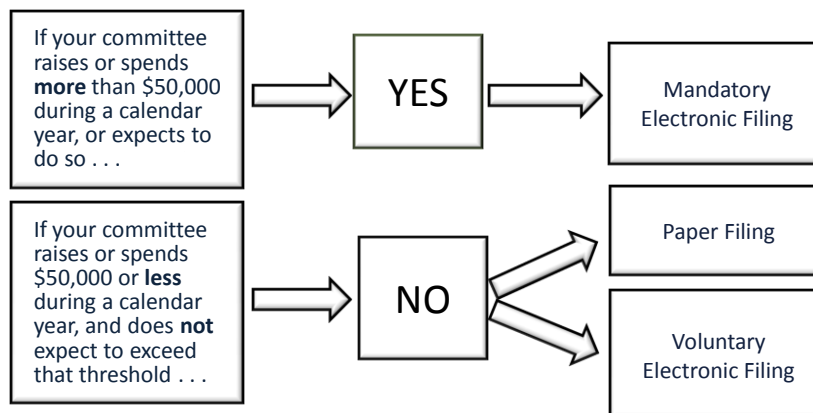
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I. Reporting - Timely Filing Schedule and Reporting Dates

- A. Quarterly Filing:** Quarterly filing is mandatory for campaigns (House, Senate, Presidential). Presidential committees are required to file monthly during election years.
1. Authorized committees file quarterly reports in all years, with quarterly reports due April 15, **July 15**, October 15 and January 31.
 2. File pre-election reports in election years.
 - a) File Pre-Primary (or Pre-Convention or Pre-Runoff if applicable) report due 12 days before election.
 - b) If participating in general election, file Pre-General report due 12 days before general.
 - c) File Post-General Report, due 30 days after general.
 - d) Reporting period always begins the day after close of books of last report filed.

Tip: You can find information on reporting deadlines by visiting http://www.fec.gov/info/report_dates.shtml

Are you Required to File Electronically?



NOTE: Senate campaigns must file their FEC reports on paper, but may submit unofficial copies of those reports electronically.



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Electronic Filing



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B. Electronic vs. Paper Reporting (Campaign Guide for Congressional Candidates and Committees (“Guide”), pp. 83-88)

1. Who Must E-File?

House campaign committees that raise or spend more than \$50,000 in a calendar year, or that have reason to expect to do so.

2. Who is Exempt from Mandatory E-Filing?

- a) Senate campaigns
- b) All House campaign committees that do not meet the \$50,000 threshold above.

3. Exceeding Threshold for E-Filing

- a) Once committee exceeds threshold, it begins filing electronically with the next regular report.
- b) Committee must continue to file electronically for the next two calendar years (January through December), unless it is a House campaign committee that has \$50,000 or less in net debts outstanding on January 1 following the general election, and that anticipates terminating prior to January 1 of the next election year.

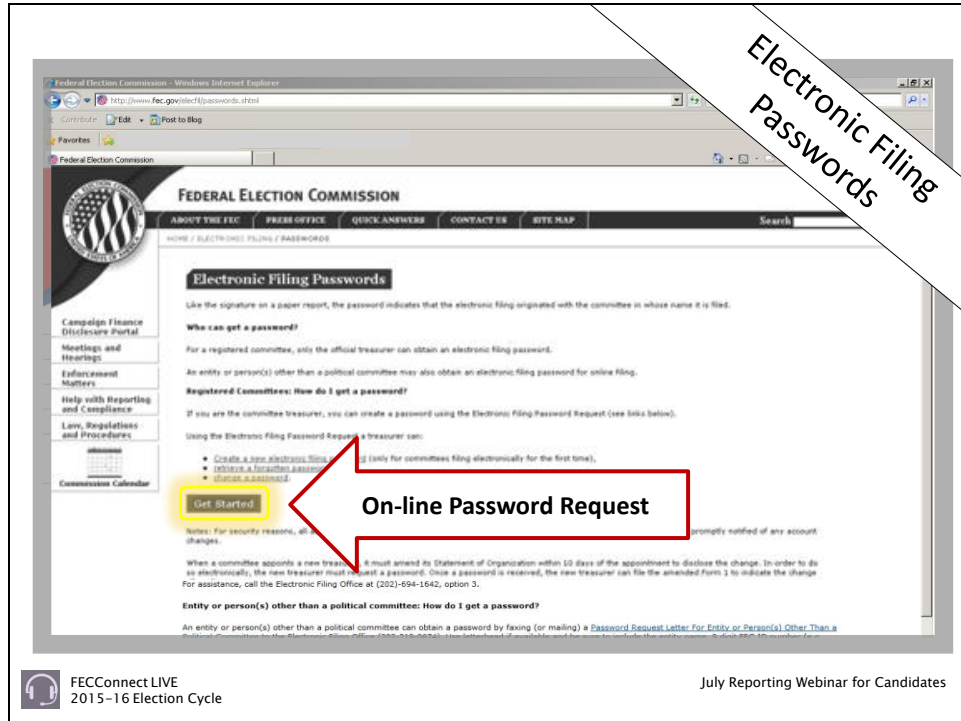
4. Voluntary Filing

- a) House campaign committees that aren't required to e-file, but choose to anyway, must continue to do so for the remainder of the calendar year.
- b) Senate campaigns must still file paper copy.
- c) New committees with no prior data on which to base calculations have reason to expect to exceed threshold if they either:
 - (1) Receive contributions or make expenditures that exceed \$12,500 in first quarter of calendar year, or
 - (2) Receive contributions or make expenditures that exceed \$25,000 in first half of the calendar year.
 - (3) Threshold calculated on a per-committee basis; affiliated committees calculate their own contributions and expenditures separately for purposes of determining if they have met mandatory e-filing threshold.

5. Paper Filing by E-Filer

House campaign committees that submit a report on paper that should have been filing electronically will be treated as non-filers and may be subject to enforcement actions (including Administrative Fines).

6. To meet the filing deadline, electronically filed reports must be received and validated by the Commission's computer system on or before 11:59 p.m. (Eastern Time) on the filing date.



C. **Electronic Filing** (Guide, pp. 83-85)

1. **Passwords Required** - Before you can electronically file, you will have to obtain a password. You cannot file without one.
2. **Who Can Get a Password?**
Only the official treasurer can obtain an electronic filing password. It is important that the committee has provided a valid email address on its Statement of Organization, as a validation email will be sent out the Committee.
3. **How Do You Get a Password?**
 - a) Most committees may obtain or change their password online at <http://www.fec.gov/electfil/passwords.shtml>.
 - b) Existing committees that have not previously used the online system should contact the Electronic Filing Office for assistance at 202-694-1307.
4. **How Long Does it Take?**
 - a) Passwords can now be obtained in just a few minutes online.
 - b) We recommend you request your password as early in the process as possible, in case any issues arise.
5. **The Password is Case-Sensitive.**
6. **Remember your Password** – If your forget it, you will have to request a new one.
7. For more information, visit <http://www.fec.gov/electfil/electron.shtml>.

Administrative Fine Program

- ▣ Civil money penalties for filing late, or not filing at all.
- ▣ Size of fine depends on various factors.



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D. Administrative Fine Program (AFP)

1. Background

Program for assessing civil money penalties for violations for failure to file reports on time and/or at all.

2. Applies to:

- a) Late filers
- b) Non-filers
- c) Regulations found at 11 CFR 111.30-111.45

Administrative Fine Program

- ▣ **Election-sensitive reports:**
 - **Late filer** – filed after due date, but prior to four days before the applicable election
 - **Non-filer** – filed later than that or not at all
- ▣ **Non-sensitive reports:**
 - **Late filer** – filed \leq 30 days after the due date
 - **Non-filer** – filed $>$ 30 days late or not at all



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3. **Civil Money Penalties -- Factors in determining:**

The interaction of several factors will determine the size of the penalty (also see calculator on website at http://www.fec.gov/af/af_calc.shtml).

- a) **Election Sensitivity**
 - (1) Election sensitive reports include:
 - (a) October Quarterly of election year,
 - (b) October Monthly of election year, and
 - (c) Pre-election reports for primary, general and special elections.
 - (2) All other reports are considered nonsensitive.
- b) **Whether Committee is a Late filer or a Non-filer**
 - (1) **For Sensitive Reports**
 - (a) **Late filer** – when report is filed after the due date but more than four (4) days prior to the election.
 - (b) **Non-filer** - report filed after due date and four (4) days or less before the election, or not at all.
 - (2) **For Nonsensitive Reports**
 - (a) **Late filer** – when report is filed within 30 days after the due date.
 - (b) **Non-filer** – when report is filed 31 or more days after due date, or not at all.
 - (3) Can still be considered a “nonfiler” even if report is eventually filed.

Administrative Fine Program

- ▣ Prior civil money penalties for reporting violations
- ▣ Financial activity in report
- ▣ Smaller penalties for activity < \$50,000
- ▣ Penalty calculator on FEC website at http://www.fec.gov/af/af_calc.shtml



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- c) **Prior civil money penalties for reporting violations under the AFP.**
- d) **Financial Activity**
 - (1) Amount of financial activity in the report – total amount of receipts and disbursements.
 - (2) Committees with less than \$50,000 in financial activity during the reporting period in question are subject to reduced penalties under the AFP pursuant to April 2003 revisions to the regulations.
 - (3) July 2013 revisions to the AFP regulations adjusted penalties for inflation.
 - (4) Campaign Finance Analysts will not be able to tell you if you will be fined or how much. You can use the Administrative Fine calculator (http://www.fec.gov/af/af_calc.shtml) to estimate your fine. Your committee will be notified in writing if the FEC assesses a civil penalty against your committee under the AFP.

Best Efforts to File on Time

- ▣ Best efforts may be used as a defense for late filing if:
 - Committee was prevented from filing report on time by reasonably unforeseen circumstances beyond committee's control
 - Filed the report no later than 24 hours after the end of those circumstances



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- E. Timely Filing/Using Best Efforts (not the same as “best efforts” for obtaining contributor information)**
- 1. Reports required on time;** no extensions.
 - 2. If report not filed on time,** committees may use “best efforts” defense if committee took normal precautions and trained staff, but failure to report was due to circumstances beyond committee's control and the late report was filed within 24 hours after those circumstances ended (pursuant to April 2007 revisions to AFP regulations).

Best Efforts to File on Time

- ▣ Committee may use best efforts defense if late filing is due to:
 - Failure of FEC computers/Commission-provided software, despite committee seeking technical assistance from FEC personnel and resources
 - Widespread disruption of information transmissions over internet
 - Severe weather or other disaster-related event



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3. When can best efforts defense be used:

- a) Committee may use best efforts defense if failure to report is due to failure of Commission computers or software, despite receiving Commission technical assistance, widespread disruption of information transmissions over the internet, or severe weather or other disaster-related event.

Best Efforts to File on Time

- ▣ Committee may **not** use best efforts defense if late filing is due to:
 - Negligence;
 - Illness, inexperience or unavailability of treasurer or committee staff;
 - Committee computer, software or ISP failures;
 - Delays caused by committee vendors/contractors;
 - Failure to know; or
 - Failure to use filing software properly.



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- b) Committee may not use best efforts defense if failure to report is due to unavailability, inexperience or negligence of staff, counsel or organization, failure of committee's computer system, delays caused by vendors, failure to understand or know the law or failure to use filing software properly.
4. **For more information, review:**
http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-7.pdf (rules)
and
http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-13.pdf
(policy statement)
and the May and July 2007 *Record* issues.

Objectives

- ❑ Review reporting schedule for 2016 and the importance of timely filing
- ❑ **Evaluate common reporting errors and disclosure scenarios**
- ❑ Learn about the review of reports and responding to Requests for Additional Information
- ❑ Discuss best practices for reporting and compliance



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II. Campaign Finance Disclosure on FEC Form 3

FEC Form 3

- ▣ Used by House and Senate filers
- ▣ Cover Page – shows report type/coverage dates
- ▣ Summary Page – overview of receipts and disbursements
- ▣ Detailed Summary Pages – overview of receipts and disbursements by category
- ▣ Schedules – show detailed info by line number



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Detailed Summary Page: Receipts

DETAILED SUMMARY PAGE of Receipts		
FEC Form 3 (Revised 02/2003)		Page 3
Write or type Committee Name		
Report Covering the Period: From: MM / DD / YYYY To: MM / DD / YYYY		
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....		
(ii) Unitemized.....		
(iii) TOTAL of contributions from individuals.....		
(b) Political Party Committees.....		
(c) Other Political Committees (such as PACs).....		
(d) The Candidate.....		
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11a(ii), (b), (c), and (d)).....		
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.....		



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Reporting Receipts

- ▣ **Itemize regardless of amount:**
 - Contributions from party committees / organizations
 - Contributions from other political committees
 - Transfers
 - Loans
- ▣ **All other receipts:**
 - Itemize once they exceed \$200 when aggregated with other receipts from that same source during an election cycle



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- A. Report Receipts on the Appropriate Line Number**
- 1. Itemize Regardless of Amount:**
 - a) Contributions from political committees - Line 11b or 11c
 - b) Transfers from affiliated authorized committees - Line 12
 - c) Loans received – Line 13a or 13b
 - 2. Threshold for Other Categories**

Itemize all other receipts once they exceed \$200 when aggregated with other receipts from that same source during the election cycle.

Detailed Summary Page: Disbursements

FEC Form 3 (Revised 02/2003)		
DETAILED SUMMARY PAGE of Disbursements		
Page 4		
II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....		
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.....		
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....		
(b) Of All Other Loans.....		
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....		
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....		
(b) Political Party Committees.....		
(c) Other Political Committees (such as PACs).....		



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Reporting Disbursements

- ▣ **Itemize regardless of amount:**
 - Transfers to affiliated committees
 - Loan repayments
 - Loans made
 - Contributions made to other federal candidates
 - Refunds to other political committees
- ▣ **All other disbursements:**
 - Itemize once they exceed \$200 in aggregate during an election cycle



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- B. Report Disbursements on the Appropriate Line Number**
- 1. Itemize Regardless of Amount:**
 - a) Transfers to affiliated authorized committees – Line 18

- b) Loan repayments – Line 19
- c) Contributions made to other federal candidates/other political committees – Line 21

2. Threshold for Other Disbursement Categories

Itemize all other disbursements once they exceed \$200 when aggregated with other disbursements to the same payee during the election cycle.

Purpose of Disbursement

- ▣ **Rule of thumb:** Could reader discern why a payment was made simply by reading the description provided?
- ▣ Non-exhaustive lists available on FEC.gov at:
<http://www.fec.gov/law/policy.shtml#purpose>



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C. Purpose of Disbursement

1. FEC regulations require that the “purpose of disbursement” entry for each disbursement be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment. 11 CFR 104.3(b)(3) and (4).
2. Policy statement includes non-exhaustive lists of acceptable and unacceptable “purpose of disbursement” descriptions intended to provide additional guidance to the regulated community and to foster consistency among filers.
3. As a general guideline, the statement suggests that filers consider whether a person unaffiliated with the campaign/committee could discern why a payment was made by reading the description they have provided.
4. List is updated periodically and made available online at <http://www.fec.gov/rad/candidates/FEC-ReportsAnalysisDivision-CandidateCommittees.shtml#disbursements>.

Purpose of Disbursement

Entry must be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment

Full Name (Last, First, Middle Initial) A. ABC Group		Date of Disbursement 06 / 15 / 2016	
Mailing Address 123 Money Lane		Amount of Each Disbursement this Period 10,000.00	
City City,	State ST	Zip Code 00000	Memo Item <input type="checkbox"/>
Purpose of Disbursement FEC Compliance Consulting		Category/Type	
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:		



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Disbursements Requiring Additional Info

- Certain disbursements require memo itemization to disclose the original vendor, date, amount, address, and purpose
 - Staff reimbursements
 - Candidate in-kind contributions
 - Credit card payments
 - Payroll company payments

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: 17 18 19a 19b 19c 19d 19e 19f 19g 19h 19i 19j 19k 19l 19m 19n 19o 19p 19q 19r 19s 19t 19u 19v 19w 19x 19y 19z	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE OR FULL Committee to Elect John Smith			
Full Name (Last, First, Middle Initial) A. Credit Card Company		Date of Disbursement 04 / 28 / 2016	
Mailing Address 12 Muche Ct.		Amount of Each Disbursement this Period 1,300.00	
City Philadelphia	State PA	Zip Code 00000	Memo Item <input type="checkbox"/>
Purpose of Disbursement Credit Card Payment - See Below		Category/Type	
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:		
Full Name (Last, First, Middle Initial) B. Southwest Airlines		Date of Disbursement 04 / 16 / 2016	
Mailing Address 777 Jetstream Way		Amount of Each Disbursement this Period 1,300.00	
City Dulles	State VA	Zip Code 00000	Memo Item <input checked="" type="checkbox"/> Credit Card Payment
Purpose of Disbursement Airline Tickets		Category/Type	
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:		



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D. Disbursements Requiring Additional Itemization

Certain disbursements require supporting information that can be reported as a memo entry. The supporting memo entry must include the original vendor, date, amount, address, and purpose.


1. Staff Reimbursements
2. In-Kind Contributions from the Candidate
3. Credit Card Payments

III. Reporting Scenarios

SCENARIO #1 – Last-Minute Contributions – 48-Hour Notices (Guide, p. 81)

Scenario #1

48-HOUR NOTICES



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Scenario #1: 48-Hour Notices

48-Hour Notices are required when a contribution of \$1,000 or more is received between 20 days and 2 days before an election

- ▣ 48-Hour Notices are filed on the FEC Form 6
- ▣ Each Form 6 must be filed within 48 hours of receiving a contribution of \$1,000 or more
- ▣ Loans and in-kind contributions are included



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Scenario #1: 48-Hour Notices

- ▣ Primary Election: June 7, 2016
- ▣ 48-Hour Notice Period: May 19 – June 4, 2016
- ✓ **Computer worth \$1,000 received May 28, 2016**
- ✗ **\$5,000 check received June 5, 2016**

Which contributions require a 48-Hour Notice?



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As the June 7, 2016, primary election day approaches, Candidate George Costanza makes a number of solicitation calls to his loyal contributors. In response to his call, Jacopo Peterman (a company CEO residing at 602 Main Street, Anytown, CA 12345) donates a \$1,000 computer to the campaign, on May 28, 2016.

David Puddy, the treasurer for the Mechanics' PAC (address: 303 Main Street, Anytown, CA 12345), was on vacation when Candidate Costanza called making his appeal. Feeling bad for missing his call, and in order to get the money to the campaign before the election, Puddy walks down the street to the Costanza Campaign Office and hand delivers a \$5,000 check to Candidate Costanza on June 5, 2016.

- 1. Do any of these receipts trigger 48-Hour Notices?**
- 2. How should the committee disclose the May 28th receipt?**
- 3. How should the committee disclose the \$5,000 check received on June 5th?**

SCENARIO #1 Answers:

1. Do any of these receipts trigger 48-Hour Notices?

Answer: Yes. Campaign committees must file special notices regarding contributions of \$1,000 or more received less than 20 days but more than 48 hours before 12:01 a.m. of the day of any election in which the candidate is running (whether or not the candidate has opposition in the election). The expedited disclosure requirements apply to all types of contributions, including:

- Contributions from the candidate;
- Loans from the candidate and other non-bank sources; and
- Endorsements or guarantees of loans from banks.

In our scenario, the 48-Hour Notice period runs from May 19th through June 4th, therefore the May 28th receipt triggers the 48-Hour Notice requirements.

2. How should the committee disclose the May 28th receipt?

Answer: The \$1,000 computer given in-kind from Jacopo Peterman should be disclosed as a 48-Hour Notice and must be reported to the FEC by May 30, 2016.

Campaign committees may file their 48-Hour Notices using FEC Form 6. The notices must reach the FEC (House) or Secretary of the Senate (Senate) within 48-hours of the committee's receipt of the contribution(s). Committees filing electronically must file their 48-Hour Notices electronically. Committees filing paper forms may fax the notice to the appropriate office: House (202) 219-0174; Senate (202) 224-1851. Alternatively, a paper-filing House committee may file online using the FEC's website at <https://webforms.fec.gov/onlinefiling/form6/login.htm>

Note that a last-minute contribution must also be itemized on the Committee's next scheduled report – and, as an in-kind contribution, this receipt will be disclosed on both Schedule A and Schedule B.

Report last minute receipts: Show reporting of 48-Hour Notice on Form 6. Include notation indicating the receipt is an in-kind contribution.

See Reporting Example on Next Page

Scenario #1: 48-Hour Notices

FEC Form 6

**48 HOUR NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**
(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1,000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL George Costanza for Congress		FEC IDENTIFICATION NUMBER C00123456	
ADDRESS (number and street) One Main Street			
CITY, STATE, and ZIP CODE Anytown, CA 12345			
2. NAME OF CANDIDATE George Costanza	3. OFFICE SOUGHT (State and District) House CA – 72		
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Jacopo Peterman 602 Main Street Anytown, CA 12345		Name of Employer J. Peterman Catalog Co. Transaction ID: F6.4115 Occupation CEO	Date (month, day, year) 5/28/16 Amount \$1,000.00
SIGNATURE (optional) George Costanza		DATE 5/29/16	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100

Any information copied from reports and statements filed under the Federal Election Campaign Act may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

FEC FORM 6
(Revised 07/2011)

48-Hour Notices must be submitted w/in 48hrs of receiving contributions of \$1,000 or more (including loans and in-kinds).



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3. How should the committee disclose the \$5,000 check received on June 5th?

Answer: No 48-Hour Notice is required. Though the contribution is over \$1,000, it was received outside the 48-Hour Notice period of May 19th through June 4th. Contributions received outside of that time period do not require expedited disclosure. The receipt will be reported on the campaign committee's next scheduled report, the July Quarterly Report.

Scenario #1: 48-Hour Notices

Methods for Filing Form 6:

- ▣ Electronically through FECFile and other filing software
- ▣ Electronically through the FEC website's online webform*
- ▣ For Senate committees, by mail or fax to the Secretary of the Senate
- ▣ For House committees filing on paper, by mail or fax to the FEC

* <https://webforms.fec.gov/onlinefiling/form6/login.htm>



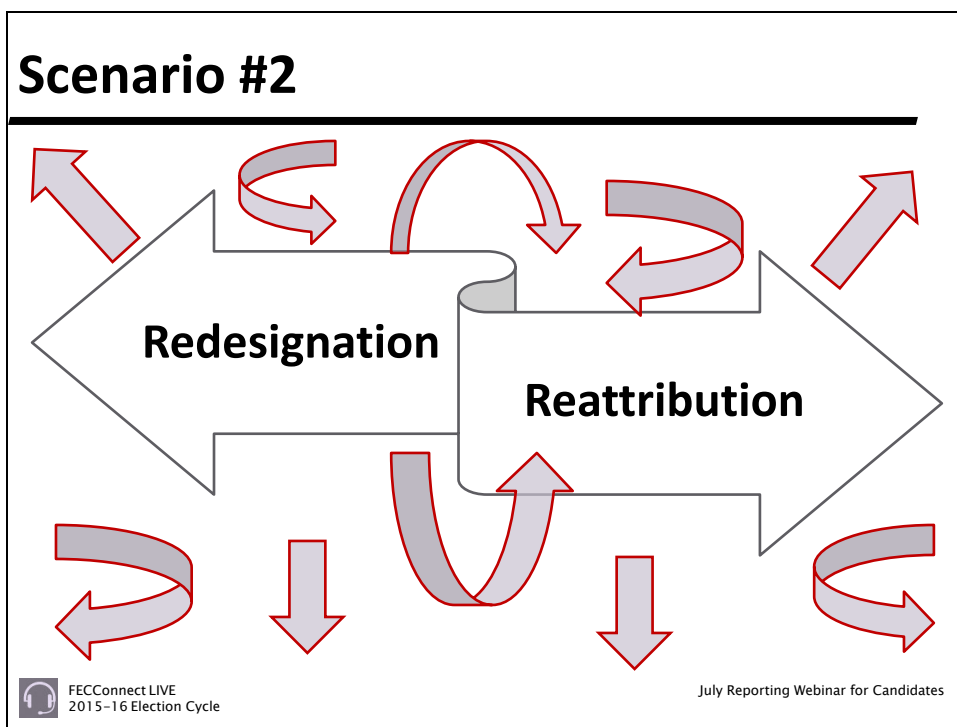
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Key issues:

- 48-Hour Notice is used to disclose contributions of \$1,000 or more received less than 20 days but more than 48 hours before 12:01a.m. on the day of any election in which the candidate is running. The requirement is triggered whether or not the candidate has opposition in the election.
- A state-by-state chart of 48-Hour Notice periods for 2016 primary elections can be found at http://www.fec.gov/info/charts_primary_dates_2016.shtml.
- **Where and When to File:**
 - **House Committees** – file with the FEC on Form 6
 - Electronic filer: file electronically.
 - Paper filer: file via fax or online using the FEC website.
 - Must be filed within 48 hours after receipt.
 - **Senate Committees** – File with Secretary of Senate on Form 6
 - File via mail or fax.
 - Must be filed within 48 hours of receipt.
- Any receipts disclosed on the 48-Hour Notice must be disclosed again as a contribution/loan on the next scheduled report.

SCENARIO #2: Curing Excessives -- Redesignations and Reattributions (Guide, pp. 24-27; 93-94)



Reporting Receipts

Review

How to Itemize Receipts

Always Itemize:

- ✓ Contributions from party committees and organizations
- ✓ Contributions from other political committees
- ✓ Transfers
- ✓ Loans

Itemize all other receipts when:

- ✓ Aggregate > \$200 from one source in an election cycle

Curing Excessives

Options: The Three R's

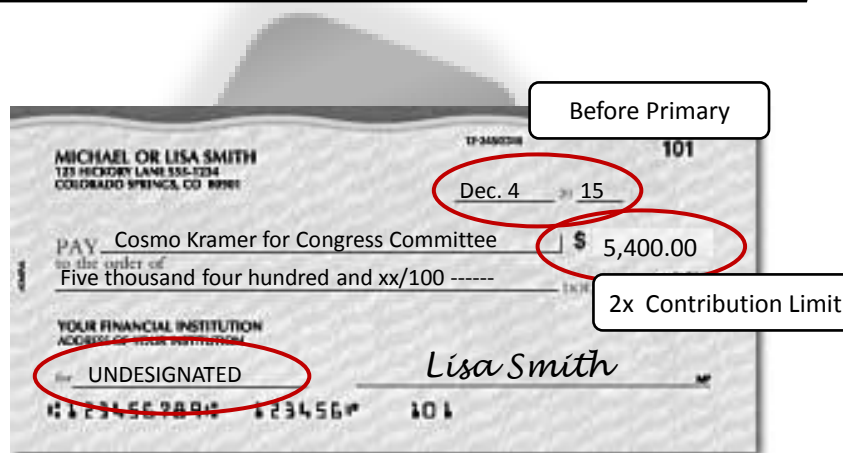
Refund	Redesignate	Reattribute
<ul style="list-style-type: none">To the contributor	<ul style="list-style-type: none">To another election	<ul style="list-style-type: none">To another contributor
1	2	3



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Curing Excessives



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Curing Excessives

Options: The Three R's



Curing Excessives

Options: The Three R's



Curing Excessives

Presumptive Redesignation



1. Designate \$2,700 to Primary
2. Redesignate \$2,700 to General
3. Notify Lisa, offering option of refund

* Ensure that contributor does not exceed contribution limit



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Presumptive Redesignation

If an individual or a non-multicandidate committee makes an excessive primary contribution, campaign may presumptively redesignate excessive portion to general election if contribution:

- Is made before candidate's primary election;
- Is not designated in writing for a particular election;
- Would be excessive if treated as a primary election contribution; and
- As redesignated, does not cause the contributor to exceed contribution limit.

Notification Requirement

Committee must notify contributor of redesignation by paper mail, e-mail, fax or other written method within 60 days of treasurer's receipt of contribution; must notify contributor of right to receive refund instead.

Curing Excessives

Options: The Three R's

Refund	Redesignate	Reattribute
• To the contributor	• To another election	• To another contributor

Curing Excessives

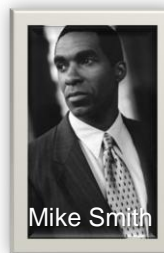


Curing Excessives

Presumptive Reattribution



1. Attribute \$2,700 to Lisa
2. Reattribute excessive \$2,700 to Michael
3. Notify both; offering option of a refund



* Ensure that neither contributor exceeds contribution limit



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Presumptive Reattribution

If individual contribution exceeds limit and is made on joint account, but has only one signature:

- Attribute permissible amount to the signer; and
- Presumptively reattribute excessive amount to other account holder, without obtaining his/her signature.

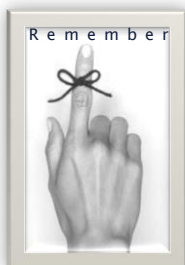
Notification Requirement

Committee must notify contributor of reattribution by paper mail, e-mail, fax or other written method within 60 days of treasurer's receipt of contribution; must notify contributor of right to receive refund instead.

Curing Excessives

How to Avoid Excessives

- ▣ Encourage contributors to designate contributions
- ▣ Obtain signatures for joint contributions
- ▣ Designation required if:
 - Contributing to a future election (i.e., not next election)
 - Contributing to retire debt from a past election

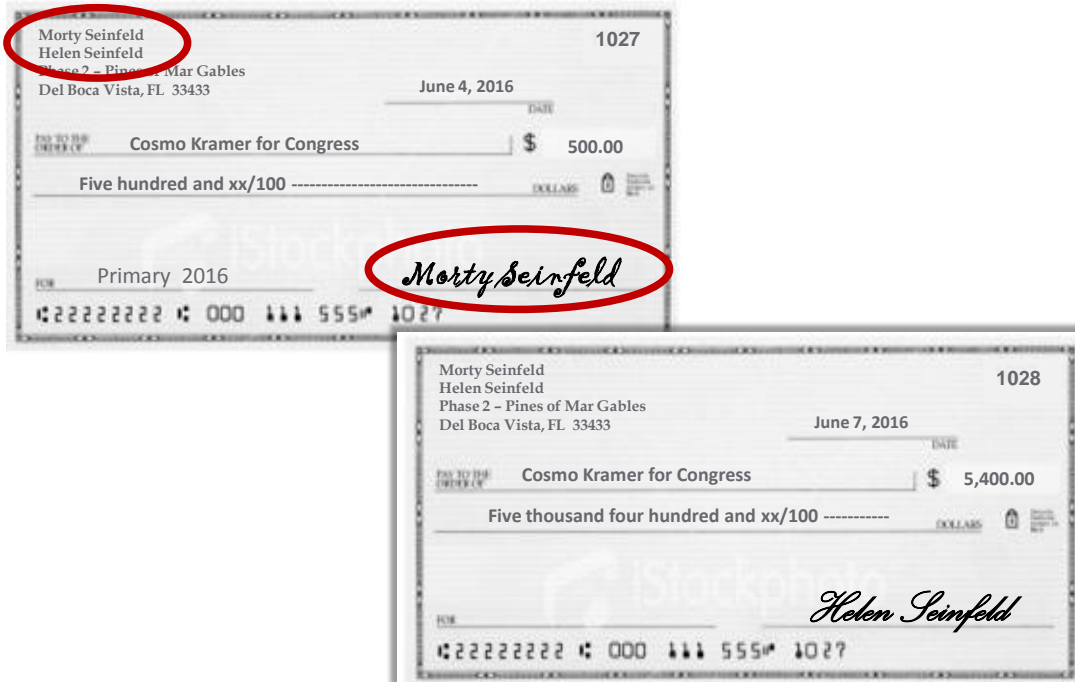


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**SCENARIO #2: Curing Excessives -- Redesignations and Reattributions
(Guide, pp. 24-27; 93-94)**

Scenario #2: Redesignation/Reattribution



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Congressman Cosmo Kramer is running for re-election in 2016. While visiting his son in New York City, Morty Seinfeld attended the Congressman's June 4, 2016, fundraiser at Monk's Café. At the event, he made a \$500 contribution, designated for the primary (see check above).

When Morty returned home to Florida, he talked to his wife, Helen, about doing more to get their friend Kramer re-elected to Congress. In response, she mailed the campaign a check for \$5,400 (see check above), which the campaign received on June 10, 2016.

1. How should the committee disclose the \$500 contribution from Morty Seinfeld?
2. Can we accept Helen's contribution check as written? If not, what must the campaign do to remedy the situation?
3. How should the committee disclose the transaction(s) that remedy the excessive contribution?

SCENARIO #2 – Answers:

1. How should the committee disclose the \$500 contribution from Morty Seinfeld?

Answer: Contributions from individuals are reported on Schedule A for Line 11(a)(i).

Part 1 of 2: Report Receipt from Individual (Pre-Primary)

Form 3: Schedule A, Line 11(a)(i)

Redesignation & Reattribution

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FO LINE NUMBER: (check only one)
☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 112 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)
Cosmo Kramer for Congress

Full Name (Last, First, Middle Initial)
Morty Seinfeld

A. Mailing Address
Phase 2 – Pines of Mar Gables
City **Del Boca Vista** State **FL** Zip Code **33433**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Retired**


Receipt For:
☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date
500.00

Date of Receipt
MM / DD / YYYY
06 / 04 / 2016

Amount of Each Receipt this Period
500.00

☐ Memo Item

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2. Can we accept Helen's contribution check as written? If not, what must the campaign do to remedy the situation?

Answer: No. Potentially, these could be joint contributions. However, since only Helen signed the \$5,400 check, Helen has made an excessive contribution for the primary. To remedy this, the campaign can reattribute and/or redesignate the excessive portion of her contribution.

Scenario #2: Redesignation/Reattribution



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3. How should the committee disclose the transaction(s) that remedy the excessive contribution?

Answer: The Kramer campaign may remedy the excessive contribution by both applying the excessive portion to another contributor (joint account holder via reattribution) and to a future election (redesignation).

Reattribution

Since Helen's contribution is drawn on a joint account, the campaign has the option of reattributing the excessive portion to the joint account holder, Morty Seinfeld. The campaign may presumptively reattribute the excessive portion (\$2,700) to Morty for the primary election as long as it would not cause him to exceed his limits.

Report receipt: show reporting on Schedule A for Line 11(a)(i). Two separate entries:

- Show check as written: \$5,400 contribution from Helen Seinfeld for primary; and
- In a MEMO entry (noted by checking the "Memo Item" box), subtract excessive amount of contribution: -\$2,700 removed from Helen Seinfeld's primary contribution.

For both entries, include cross-reference notations: "reattribution and redesignation below."

In our scenario, Morty Seinfeld made a \$500 contribution before the above check was written, so that attributing the full \$2,700 to him for the primary would cause him to exceed his limit for that election by \$500. Therefore, only \$2,200 may be reattributed to Morty.

Report reattribution: show reporting on Schedule A for Line 11(a)(i). Show full \$5,400 as primary contribution from Helen Seinfeld. Change attribution of excessive portion to Morty Seinfeld as MEMO entry (noted by checking the “Memo Item” box) and include notation in Amount of Each Receipt this Period box indicating, “reattribution.” Please be sure to properly use MEMO entries to avoid inaccuracies in aggregation and cash on hand.

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

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NAME OF COMMITTEE (In Full)
Cosmo Kramer for Congress

Full Name (Last, First, Middle Initial)
Helen Seinfeld

A. Mailing Address
Phase 2 – Pines of Mar Gables
City **Del Boca Vista** State **FL** Zip Code **33433**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Homemaker**

Receipt For: ☒ Primary ☐ General ☐ Other (specify) **2,700.00**

Full Name (Last, First, Middle Initial)
Helen Seinfeld

B. Mailing Address
Phase 2 – Pines of Mar Gables
City **Del Boca Vista** State **FL** Zip Code **33433**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Homemaker**

Receipt For: ☒ Primary ☐ General ☐ Other (specify) **2,700.00**

Full Name (Last, First, Middle Initial)
Morty Seinfeld

C. Mailing Address
Phase 2 – Pines of Mar Gables
City **Del Boca Vista** State **FL** Zip Code **33433**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Retired**

Receipt For: ☒ Primary ☐ General ☐ Other (specify) **2,700.00**

FOR LINE NUMBER: (check only one)
☒ 11a ☐ 11b ☐ 11c ☐ 11d ☐ 11e

Date of Receipt
06 / 07 / 2016

Amount of Each Receipt this Period
5,400.00

☐ Memo Item

Date of Receipt
06 / 07 / 2016

Amount of Each Receipt this Period
- 2,700.00

☒ Memo Item
Reattribution and Redesignation below

Date of Receipt
06 / 07 / 2016

Amount of Each Receipt this Period
2,200.00

☒ Memo Item
Reattribution

Redesignation & Reattribution

**Part 2 of 2:
Report
Reattribution &
Redesignation
(Pre-Primary
Report)**

**Form 3:
Schedule A,
Line 11(a)(i)**

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With the remaining \$500, the campaign can presumptively redesignate the excessive \$500 to the general election as a remedy.

Redesignation

Campaign committees may also remedy an excessive contribution by applying the excessive portion to a future election. The campaign may presumptively redesignate the excessive portion to the general election as long as the contribution:

- Is made before the candidate's primary election;
- Is not designated;
- Would be excessive if treated as a primary election contribution; and
- As redesignated, does not cause the donor to exceed any other limits.

Helen Seinfeld has not yet made any general election contributions; therefore the campaign may presumptively redesignate either the full \$2,700 excessive portion of primary contribution to the general, or the \$500 that remains after the reattribution to Morty. To maximize the availability of funds for the primary, the campaign chooses the latter.

Report redesignation: show reporting on Schedule A for Line 11(a)(i) as a \$500 contribution from Helen Seinfeld. Change designation to general as a MEMO entry (noted by checking the "Memo Item" box) and include notation in Amount of Each Receipt this Period box indicating, "redesignation."

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

FOR LINE NUMBER: (check only one) ☒ 11a ☐ 11b ☐ 11c ☐ 11d ☐ 11e

NAME OF COMMITTEE (In Full)
Cosmo Kramer for Congress

Full Name (Last, First, Middle Initial)
A. Helen Seinfeld

Mailing Address
Phase 2 – Pines of Mar Gables

City **Del Boca Vista** State **FL** Zip Code **33433**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Homemaker**

Receipt For: ☒ Primary ☐ General ☐ Other (specify) **Redesignation**

Election Cycle-to-Date **3,200.00**

Date of Receipt **06 / 07 / 2016**

Amount of Each Receipt this Period **500.00**

☒ Memo Item

Redesignation

Amount of Each Receipt this Period **2,700.00**

☒ Memo Item

Reattribution

**Part 2 of 2:
Report
Reattribution &
Redesignation
(Pre-Primary
Report)**

**Form 3:
Schedule A,
Line 11(a)(i)**

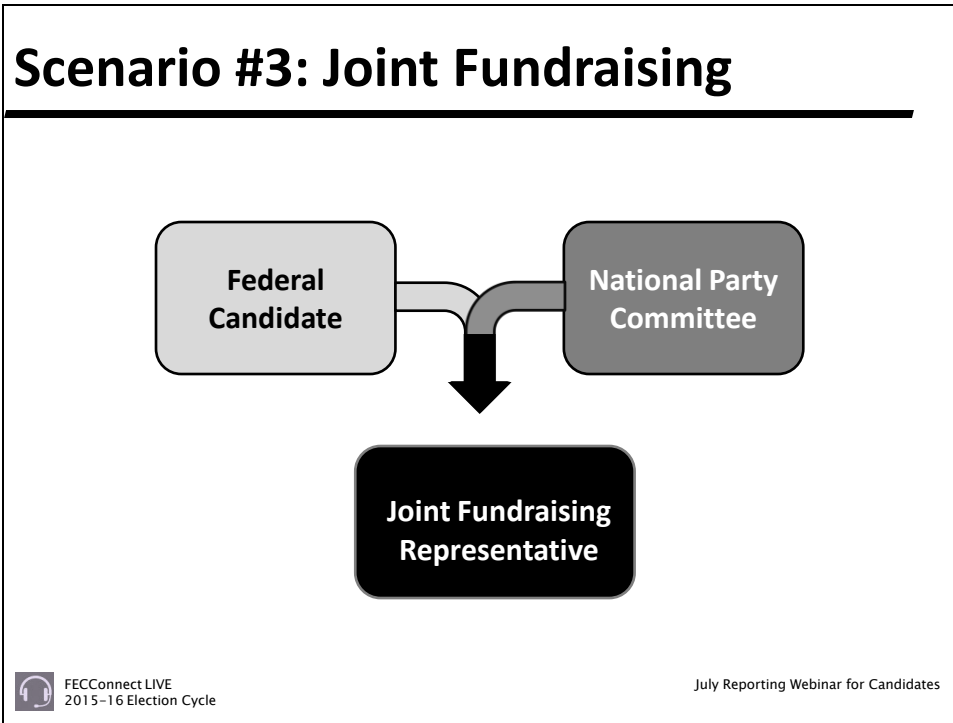
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Key issues:

- Presumptive reattribution is allowed even if only one signature is on the check. Ensure that the reattribution won't cause donors to exceed any limits (i.e., per election limits).
- Presumptive redesignation from the primary to the general election is allowed if the contribution is not designated for a particular election. For example, if Helen had written "primary" on the memo line of her check, a presumptive redesignation would not be allowed. The redesignation would need to be done the "old" way – with written authorization from contributor within 60 days of receipt BEFORE the redesignation could occur.
- Remember written notification to contributor(s) must be done within 60 days of receipt for presumptive reattributions and redesignations. The notification must also offer the contributor the option to receive a refund instead.

SCENARIO #3: Joint Fundraising Transfers (*Guide, Appendix C, pp. 137-144*)



- ### Scenario #3: Joint Fundraising
- ▣ Election-related fundraising held jointly by campaign + one or more other committees
 - ▣ Joint Fundraising Representative (JFR)
 - Collects/deposits joint fundraising contributions
 - Pays expenses and transfers proceeds to participants
 - Participants amend Form 1 to designate JFR as an authorized committee
 - ▣ Written Agreement
 - Outlines allocation formula for proceeds and expenses among all participants
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- July Reporting Webinar for Candidates

Joint Fundraising – 11 CFR 102.17

Election-related fundraising conducted by a campaign committee and one or more other political committees or unregistered organizations.

- **Joint Fundraising Representative**
 - All participants must either create a new committee (recommended) or select one of the participating federal political committees to act as joint fundraising representative (JFR).
 - New committee established as JFR must register with the FEC and must include the name of each participating federal candidate in the new committee's name.
 - Participants amend FEC Form 1 accordingly to designate JFR as an authorized committee.
 - Responsible for collecting and depositing joint contributions, paying expenses and allocating net proceeds to all participants.
 - Must keep records and report overall joint fundraising activity.
- **Screening Contributions**
 - JFR and participants must screen contributions to make sure they are neither prohibited nor in excess of contribution limits.
 - Maximum limit = total amount he/she may contribute to all participants, without exceeding any limits.
- **Joint Fundraising Agreement**

Participants agree to formula to allocate proceeds and expenses and sign a written agreement.
- **Reporting Tips for Campaign as Participant** (Guide, pp. 137)
 - Upon receipt of net proceeds, campaign reports its share as a transfer-in on Form 3 for Line 12 (Transfers from Other Authorized Committee).
 - In addition, campaign also must itemize contributions from the original donors making up its share of the gross receipts as MEMO entries on Schedule A (only contributions aggregating over \$200 for the election cycle for the contributor require itemization).

SCENARIO #3: Joint Fundraising Transfers (*Guide, Appendix C, pp. 137-144*)

Scenario #3: Joint Fundraising

- ▣ Representative Cosmo Kramer and Senator George Costanza form Kramer/Costanza Victory Fund
 - Split proceeds 50%
- ▣ Event raises \$5,400
 - \$2,700 from two individuals
- ▣ Event expenses were \$1,000
- ▣ Each committee receives \$2,200 from JF



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Representative Cosmo Kramer and Senator George Costanza decide to hold an event on June 14, 2016, in Candidate Kramer's district for their 2016 campaigns. They plan to divide the expenses and proceeds equally and have designated the "Kramer/Costanza Victory Fund" as their joint fundraising representative.

At the event, Kramer/Costanza Victory Fund collects a total of \$5,400. The only contributions came from two of Candidate Kramer's high school friends, Matt Wilhelm and David Puddy. Each made a \$2,700 contribution at the event. Since the proceeds were split evenly (50%) between Representative Kramer and Senator Costanza, Mr. Wilhelm and Mr. Puddy each made a \$1,350 contribution to Representative Kramer and a \$1,350 contribution to Senator Costanza.

Kramer/Costanza Victory Fund incurred \$1,000 in expenses to put on the June 14th event. As a result, the Kramer for Congress Committee received a check from the Kramer/Costanza Victory Fund on June 21, 2016, in the amount of \$2,200, comprising the committee's 50% allocation of net proceeds.

- 1. How should the committee disclose the transfer in from Kramer/Costanza Victory Fund?**
- 2. Is any additional disclosure necessary?**

SCENARIO #3 Answers:

1. How should the committee disclose the transfer in from Kramer/Costanza Victory Fund?

The funds are coming from Kramer/Costanza Victory Fund, which has been authorized to raise money for the candidate. Therefore, the receipt is treated as a transfer of funds from an authorized committee – not as contributions from individuals. The campaign committee should itemize its net proceeds (the campaign's share of the gross contributions, minus its share of expenses) as a receipt from Kramer/Costanza Victory Fund.

2. Is any additional disclosure necessary?

Yes. The committee must list the individual contributions contained in the transfer-in from the JFR that meet the itemization threshold using MEMO entries on Schedule A. The MEMO entries (noted by checking the "Memo Item" box) should be linked to the transfer (for electronic filers) or appear directly underneath the main transfer entry. This will make it clear which individual contributions made up each transfer in cases where the committee reports multiple JFR transfers. (If unable to link or list individual contributions underneath the main transfer entry, specify the JFR transfer date next to each individual contribution as MEMO text).

Report receipt of transfer from Joint Fundraising Representative (JFR): show reporting on Schedule A for Line 12. The Date of Receipt is the date the campaign receives the net proceeds from the JFR.

Report individual contributors: Show reporting on Schedule A for Line 12 using MEMO entries (noted by checking the "Memo Item" box). The Date of Receipt is the date the JFR received the contribution from the individual; the Amount of Each Receipt this Period is the campaign's full share of contribution (before expenses); also include the notation in the Receipt This Period box indicating, "Kramer/Costanza Victory Fund – Joint Fundraiser."

See Reporting Example on Next Page

Scenario #3: Joint Fundraising

Transfer-In
Net Proceeds

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER (check only one) **12** 11a 11b 11c 11d 11e

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NAME OF COMMITTEE (in Full)
Cosmo Kramer for Congress

A. Full Name (Last, First, Middle Initial)
Kramer/Costanza Victory Fund

Mailing Address
48 West 77th Street
New York NY 10024

Date of Receipt
06 / 21 / 2016

FEC ID number of contributing federal political committee.
C 00558741

Name of Employer
Occupation

Amount of Each Receipt this Period
2,200.00

Receipt For:
☒ Primary ☐ General ☐ Other (specify) **2,200.00**

Joint Fundraising Committee

B. Full Name (Last, First, Middle Initial)
Matt Wilhelm

Mailing Address
340 Amsterdam Avenue
New York NY 10024

Date of Receipt
06 / 14 / 2016

FEC ID number of contributing federal political committee.
C

Name of Employer
New York Mets
Head Scout

Amount of Each Receipt this Period
1,350.00

Receipt For:
☒ Primary ☐ General ☐ Other (specify) **1,350.00**

Kramer/Costanza Victory Fund - Joint Fundraiser

C. Full Name (Last, First, Middle Initial)
David Puddy

Mailing Address
375 West End Avenue
New York NY 10024

Date of Receipt
06 / 14 / 2016

FEC ID number of contributing federal political committee.
C

Name of Employer
West End Auto Body
Mechanic

Amount of Each Receipt this Period
1,350.00

Receipt For:
☒ Primary ☐ General ☐ Other (specify) **1,350.00**

Kramer/Costanza Victory Fund - Joint Fundraiser

Form 3: Schedule A, Line 12

- Report transfer received from JFR
- Memo entries for individual donors



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Key issues:

Joint Fundraising

- The date of receipt may be different for the JFR and the contributors.
- Report the transaction using Line 12 (Transfers from Other Authorized Committee), not Line 11(a)(i).
- Use MEMO entries to break out contributor itemization.
 - Report gross amount of contribution(s) and include a notation referring back to JFR.
 - Itemize contributions from the original donors making up its share of the gross receipts as MEMO entries (noted by checking the "Memo Item" box) on Schedule A (only contributions aggregating over \$200 for the election cycle for the contributor require itemization).
 - Please note that in most cases, the net amount of the transfer in to a participating campaign committee will be less than the sum of the MEMO entries (noted by checking the "Memo Item" box) supporting the transfer.
- The JFR pays expenses out of the total funds raised, and then gives participating committees their allocated share of the leftover money.
- Remember, when designating a separate JFR, participating campaign(s) must amend their FEC Forms 1 & 2 to add the JFR as an authorized committee.

SCENARIO #4: Candidate Loan from Personal Funds (Guide, pp. 91 and 109)

Scenario #4: Candidate Loans



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Scenario #4: Candidate Loans

Candidate Loans from Personal Funds

- ▣ Acceptable sources
 - Assets
 - Income
 - Interest/Dividends
 - Bequests
- ▣ Unlimited amount
- ▣ Repayment and forgiveness options



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Scenario #4: Candidate Loans

- ▣ How do you report loans from personal funds?
 - Schedule A: Receipt of a loan
 - Schedule B: Loan repayments
 - Schedule C: Continuously reporting loans until they are fully paid or forgiven



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SCENARIO #4: Candidate Loan from Personal Funds (Guide, pp. 91 and 109)

On May 10, 2016, Candidate Dusty Baker generously dips into his “rainy-day” savings account and contributes \$50,000 to his principal campaign committee to give his 2016 campaign a boost. While he wishes to be paid back in full once money from other contributors comes in, he does not set a specific due date, nor does he intend to charge the committee any interest. After a strong fundraising push in early June, contributions begin to roll in. On June 15, 2016, the Baker Campaign is able to make a partial payment of \$5,000 towards Candidate Baker's loan.

It's been a long, yet successful campaign, and the Baker Campaign's treasurer is working to close out the books on the 2016 election. Two weeks after the general election, the one outstanding committee debt is the balance on Dusty Baker's personal funds loan. Before heading home for the Thanksgiving holiday, Congressman-Elect Baker decides to simply forgive the loan balance and convert it to a contribution.

1. **How should the committee disclose the transaction(s)? Since he treated it as a loan, does it need to be disclosed as a contribution as well?**
2. **How should the committee show a repayment of \$5,000 towards a personal funds loan?**
3. **How should the committee show the forgiveness of a personal funds loan by the candidate?**

SCENARIO #4 Answers:

1. How should the committee disclose the transaction(s)? Since he treated it as a loan, does it need to be disclosed as a contribution as well?

Answer: The definition of contribution includes loans, so it must be treated as such; but, as a loan, there are additional reporting requirements. Since it came from the candidate, no contribution limit applies.

The funds are disclosed as a loan from the candidate to the campaign committee. Also, since the candidate is treating this contribution as a loan, the committee must disclose the terms of the loan from the first time it is disclosed.


Report loan as contribution: Show reporting on Schedule A for Line 13(a). The Date of Receipt is the date the money is received by the campaign committee; include notation in Receipt this Period box indicating “personal funds.”

Scenario #4: Candidate Loans

Report Receipt as Contribution Form 3: Schedule A, Line 13(a)

Personal Funds Loan

SCHEDULE A (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE OF	
ITEMIZED RECEIPTS				<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 11d		<input type="checkbox"/> 12 <input checked="" type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14 <input type="checkbox"/> 15	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.							
NAME OF COMMITTEE (In Full) Dusty Baker for Congress							
Full Name (Last, First, Middle Initial) Dusty Baker				Date of Receipt 05 / 10 / 2016			
A. Mailing Address 101 12th Street				Amount of Each Receipt this Period 50,000.00			
City Washington		State DC		Zip Code 20000			
FEC ID number of contributing federal political committee. C							
Name of Employer Washington Nationals		Occupation Manager					
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date 50,000.00		<input type="checkbox"/> Memo Item personal funds			

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Report terms of the loan: Show reporting on Schedule C for Line 13(a). The Loan Source is the candidate. Also include notation indicating “personal funds.”

Scenario #4: Candidate Loans

Personal
Funds Loan

Report Receipt as Loan Form 3: Schedule C, Line 13(a)

SCHEDULE C (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF FOR LINE NUMBER: (check only one) <input checked="" type="checkbox"/> 13a <input type="checkbox"/> 13b
LOANS			
NAME OF COMMITTEE (In Full) Dusty Baker for Congress			
LOAN SOURCE Full Name (Last, First, Middle Initial) Dusty Baker - personal funds		<input type="checkbox"/> Memo Item	Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
Mailing Address 101 12th Street			
City Washington	State DC	ZIP Code 20000	
Original Amount of Loan 50,000.00	Cumulative Payment To Date 0.00	Balance Outstanding at Close of This Period 50,000.00	
TERMS Date Incurred 05 / 10 / 2016		Date Due None	Interest Rate None % (apr)
		Secured: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	



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2. How should the committee show a repayment of \$5,000 towards a personal funds loan?

Answer: Show the total amount repaid by the committee to the candidate in the “Cumulative Payment To Date” field. The “Balance Outstanding at Close of This Period” should show only the remaining portion of the outstanding loan (“Original Amount of Loan” – “Cumulative Payment to Date” = “Balance Outstanding at Close of This Period”).

- For candidate loans, repayments of the loan principal should be reported on Line 19(a) (“Repayments of Loans Made or Guaranteed by the Candidate”) of the Detailed Summary Page.
- If the candidate charges interest on a personal funds loan, interest payments should be reported on Schedule B supporting Line 17 (“Operating Expenditures”) of the Detailed Summary Page.
 - Interest incurred but not paid should be disclosed on Schedule D.
- Non-candidate loans made to the committee by a financial institution should be reported on Line 19(b) (“Repayments of All Other Loans”) of the Detailed Summary Page.

See Reporting Example on Next Page

Scenario #4: Candidate Loans

Personal
Funds Loan

Report Loan Payment as Disbursement Form 3: Schedule B, Line 19(a)

SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
☐ 17 ☐ 18 ☒ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)
Dusty Baker for Congress

Full Name (Last, First, Middle Initial)
Dusty Baker

Date of Disbursement
06 / 15 / 2016

Mailing Address
101 12th Street

City
Washington State
DC Zip Code
20000

Purpose of Disbursement
Candidate Loan Payment

Candidate Name

Category/Type

Office Sought: ☐ House ☐ Senate ☐ President
☒ Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ☐ Memo Item

State: District:

Amount of Each Disbursement this Period
5,000.00



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Scenario #4: Candidate Loans

Personal
Funds Loan

Report Loan Payment Form 3: Schedule C, Line 13(a)

SCHEDULE C (FEC Form 3)
LOANS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE
FOR LINE NUMBER: (check only one)
☒ 13a ☐ 13b

NAME OF COMMITTEE (In Full)
Dusty Baker for Congress

Full Name (Last, First, Middle Initial)
Dusty Baker - personal funds

Loan Source ☐ Memo Item

Mailing Address
101 12th Street

City
Washington State
DC ZIP Code
20000

Original Amount of Loan
50,000.00

Cumulative Payment To Date
5,000.00

Balance Outstanding at Close of This Period
45,000.00

TERMS Date Incurred Date Due Interest Rate Secured:
05 / 10 / 2016 **None** **None** % (apr) ☐ Yes ☒ No



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3. How should the committee show the forgiveness of a personal funds loan by the candidate?

Answer:

Report candidate forgiveness of the loan: Show reporting on Schedule C for Line 13(a). The “Balance Outstanding at Close of This Period” should be \$0. (Do not include the forgiven loan balance into the total of “Cumulative Payment To Date,” since the money was not actually repaid.)

For electronic filers: Please include Memo Text with your report stating that the candidate forgave the loan.

For all filers: When the candidate forgives a loan, the committee should file a letter signed by the candidate stating that the loan is forgiven. (Please note that this requirement applies to paper and electronic filers alike. Memo text at the end of an electronically filed report stating that the candidate forgave the loan will not be accepted in lieu of the letter.)

Scenario #4: Candidate Loans

- ▣ Candidate Loan Forgiveness
 - Written, signed letter from candidate
 - Schedules B and C do not show payments
 - Make sure loan ending balance is correct



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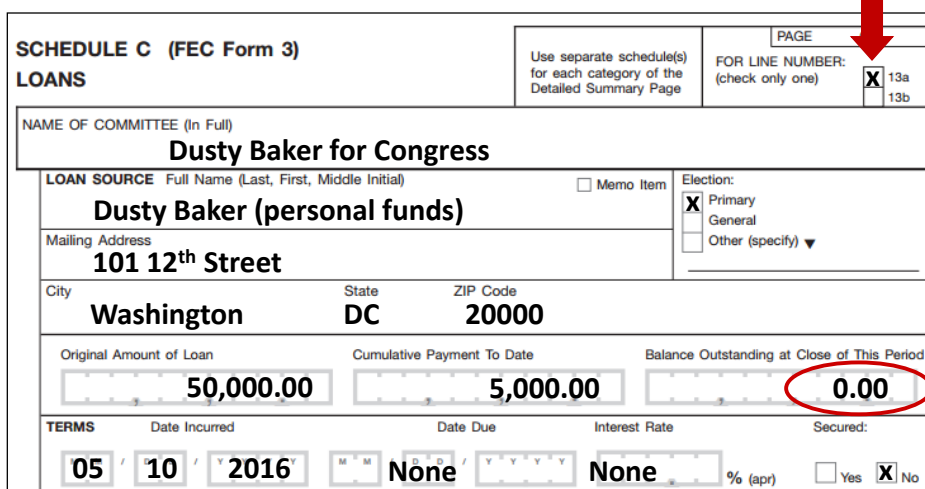
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See Reporting Example on Next Page

Scenario #4: Candidate Loans

Personal
Funds Loan

Report Forgiveness of Loan Form 3: Schedule C, Line 13(a)



SCHEDULE C (FEC Form 3)
LOANS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE
FOR LINE NUMBER: (check only one) ☒ 13a ☐ 13b

NAME OF COMMITTEE (In Full)
Dusty Baker for Congress

LOAN SOURCE Full Name (Last, First, Middle Initial) ☐ Memo Item
Dusty Baker (personal funds)

Mailing Address
101 12th Street

City **Washington** State **DC** ZIP Code **20000**

Original Amount of Loan **50,000.00** Cumulative Payment To Date **5,000.00** Balance Outstanding at Close of This Period **0.00**

TERMS Date Incurred **05 / 10 / 2016** Date Due **None** Interest Rate **None** Secured: ☐ Yes ☒ No



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Key issues:

- If the candidate wants to be paid back, be sure to report the receipt as a loan on both Schedule A, Line 13(a) and on Schedule C as an outstanding obligation when the loan is incurred. The loan should be continuously disclosed on Schedule C on subsequent reports until the loan is paid off or forgiven.
- Do not forget loan terms. Terms of a loan from the candidate's personal funds (no lending institution involved) may be more flexible. If there are no terms, do not leave boxes blank, enter "none" or "n/a."
- Include notations on both Schedules A & C indicating "personal funds." When the candidate forgives a loan, the committee should file a letter signed by the candidate stating that the loan is forgiven – for both paper and electronic filers.

Scenario #4: Candidate Loans

Loans from Personal Funds > \$250K

- ▣ Special rules apply for personal funds loans aggregating >\$250,000 for an election:
 - ✓ The committee may use contributions made on/before election date to repay loan(s) amount: must do so within 20 days of the election
 - ✓ The committee may use contributions made after the election date to repay only up to \$250,000; the rest must be converted to a contribution from the candidate by the 21st day after the election



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Repaying Candidate Loans Aggregating Over \$250,000 after an Election:

There are special rules concerning the repayment of personal loans from the candidate (including advances or candidate endorsed bank loans) that aggregate more than \$250,000 with respect to a given election. The following rules apply:

- The committee may use contributions to repay the candidate for the entire amount of the loan or loans only if those contributions were made on or before the day of the applicable election; and
- The committee may use contributions to repay the candidate only up to \$250,000 from contributions made after the date of the applicable election.
- If the committee uses the amount of cash-on-hand as of the date of the election to repay the candidate for loans in excess of \$250,000, then it must do so within 20 days of the election. During that time, the committee must treat the portion of candidate loans that exceed \$250,000, minus the amount of cash-on-hand as of the day after the election as a contribution by the candidate (11 CFR 116.11(c), Advisory Opinion 2003-30).

Scenario #5: Operating Expenditures



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Reporting Disbursements

Review

Itemize regardless of amount:

- Transfers to affiliated committees
- Loan repayments
- Loans made
- Contributions made to other federal candidates
- Refunds to other political committees

All other disbursements:

- Itemize once they exceed \$200 in aggregate during an election cycle

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SCENARIO #5: Reporting Disbursements – Operating Expenditures
(*Guide*, p. 102) and **Credit Card Transactions** (*Guide*, p. 105)

Mr. Newman, Candidate Cosmo Kramer's Treasurer, decided the smartest way for the campaign committee to pay its expenses was for the campaign to have its own credit card. During the period covered by the April Quarterly Report, the campaign's Citibank VISA card has been used to pay the following expenses:

1. \$150 paid to Poppy's Restaurant for food brought in for the January 15, 2016 monthly fundraising strategy luncheon. (The campaign has not used this restaurant before in the current election cycle.)
2. \$3,000 paid to Skyway Airlines for a charter flight Candidate Kramer took on February 13, 2016.

By not paying the credit card bill for a few months, the campaign incurred an additional \$24.50 in finance charges. On April 29, 2016, the campaign paid off the entire \$3,174.50.

1. How should the committee disclose credit card debt?

2. How should the committee properly disclose the credit card payment?

SCENARIO #5 Answers:

1. How should the committee disclose credit card debt?

Answer: Debts and obligations (other than loans) are reported on Schedule D according to the following rules:

- A debt of \$500 or less is reportable once it has been outstanding 60 days from the date incurred (date of transaction, not date bill is received). The debt is disclosed on the next regularly scheduled report.
- A debt exceeding \$500 must be reported in the report covering the date on which the debt was incurred.

Schedule D (outstanding debt): The debt to the credit card company should be disclosed on Schedule D in the same way as any other debts. List the credit card company as the debtor; be sure to reflect the outstanding debt amount at the close of the reporting period.

Please note: no memo entries for specific credit card transactions should be listed on Schedule D.

Scenario #5: Operating Expenditures

Credit
Card Debt

Report Debt - Form 3: Schedule D, Line 10

- Report amount owed as debt until reimbursed if >\$500 or outstanding >60 days
- Do not use MEMO entries on Schedule D – vendors listed on Schedule B when disclosing payment

SCHEDULE D (FEC Form 3)		(Use separate schedule(s) for each numbered line)	PAGE OF FOR LINE NUMBER: (check only one)
DEBTS AND OBLIGATIONS			<input type="checkbox"/> 9
Excluding Loans			<input checked="" type="checkbox"/> 10
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer			
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor Citibank VISA		Nature of Debt (Purpose): Credit card debt	
Mailing Address 301 10th Street, Suite 4500			
City New York	State NY	Zip Code 10001	
Outstanding Balance Beginning This Period 0.00			
Amount Incurred This Period 3,150.00	Payment This Period 0.00	Outstanding Balance at Close of This Period 3,150.00	



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Schedule B (debt payments): As the committee pays off the debt, report partial or full payments on Schedule B – include MEMO entries (noted by checking the “Memo Item” box) to show original transactions making up the amount that is being repaid to the credit card company directly below the entry for payment to the credit card company (or, for electronic filers, link these). See reporting example above.

Note for Electronic Filers: Certain types of electronic filing software may not allow you to include a portion of memo entries underlying each partial payment on a credit card debt on each report where your committee is showing a repayment. For example, your software may only allow you to include all memo entries on the first report where you show a partial payment, but may not allow you to include any memo entries on the next report(s) where you show subsequent repayment(s). In this case, please note so using Memo Text on each report where this applies to avoid Requests for Additional Information from the Reports Analysis Division of the FEC.

2. How should the committee properly disclose the credit card payment?

Answer: The committee needs to disclose the payment of charges on the campaign credit card as an operating expenditure.

How to Report:

- **Report credit card payment** on Schedule B for Line 17. Campaign should disclose total payment to the credit card with the Date of Disbursement as the date the committee pays credit card bill.
- **Report itemization of vendor (Skyway Airlines)** on Schedule B for Line 17 as a MEMO entry (noted by checking the “Memo Item” box). The Date of Disbursement is the date of the charter flight; in the Amount of Each Disbursement this Period box, include notation, “Citibank VISA” as a cross-reference to the credit card payment.
- The \$150 payment to Poppy’s Restaurant does not require itemization, as the committee’s payments to this vendor did not aggregate over \$200 in the election cycle.

See Reporting Example on Next Page

Credit Card Payment

SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (In Full)
Committee to Elect Cosmo Kramer

FOR LINE NUMBER: (check only one) 17 18 19a 19b 20b 20c 21

Use separate schedule(s) for each category of the Detailed Summary Page

Full Name (Last, First, Middle Initial)
A. Citibank VISA

Mailing Address
301 10th Street, Suite 4500

City
New York State
NY Zip Code
10001

Purpose of Disbursement
Credit card payment

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

Date of Disbursement
04 / 29 / 2016

Amount of Each Disbursement this Period
3,174.50

☐ Memo Item

Full Name (Last, First, Middle Initial)
B. Skyway Airlines

Mailing Address
301 Airport Way

City
Arlington State
VA Zip Code
20001

Purpose of Disbursement
Travel Expense – May Fundraiser

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

Date of Disbursement
02 / 13 / 2016

Amount of Each Disbursement this Period
3,000.00

☒ Memo Item

Citibank VISA

Full Name (Last, First, Middle Initial)
C. Citibank VISA

Mailing Address
301 10th Street, Suite 4500

City
New York State
NY Zip Code
10001

Purpose of Disbursement
Credit card finance charge payment

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

Date of Disbursement
04 / 10 / 2016

Amount of Each Disbursement this Period
24.50

☒ Memo Item

Citibank VISA

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Report Payment
Form 3: Schedule B
Line 17

Key issues:

- Pay attention to the itemization threshold. Take into account previous disbursements to same vendor – keep good records.
- Use MEMO entry for any payee that exceeds the itemization threshold for operating expenses (in excess of \$200 for election cycle). Also include a notation that refers back to the credit card payment as cross-reference. The report should clearly show to which disbursement each memo entry relates.
- Debts owed to credit card company are reflected on Schedule D in the period in which the debt was incurred if amount owed is in excess of \$500; or once it has been outstanding for 60 days if \$500 or less. No MEMO entries on Schedule D.
- When paying credit card debt, disclose payment to credit card company on Schedule B for Line 17, including MEMO entry for any payees making up the amount being repaid to the credit card company.

**SCENARIO #6: Staff Advances for Travel Expenses (Guide, pp. 100-101)
and Non-Travel Expenses (Guide, pp. 98-99)**

Scenario #6

Staff Advances – Travel, Non-Travel and Candidate Advances



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Bryce Harper, the Communications Manager for Dusty Baker's campaign committee, used his personal credit card on May 3, 2016, to purchase a \$550 airline ticket to represent the committee at the campaign event on Flag Day (June 14, 2016). The committee will reimburse him, but not for at least 6 months, until more contributions are received.

Another campaign volunteer, Daniel Murphy, wrote a personal check for \$750 on April 20, 2016, to pay for office supplies at his neighborhood Staples store. He submitted the receipt to the committee treasurer that same day. The committee reimbursed him in full with campaign funds on April 30, 2016.

Candidate Dusty Baker is hosting a fundraising breakfast at his home on September 22, 2016. He goes to his favorite breakfast spot, Corner Bakery, and instead of using the campaign credit card, Dusty writes a personal check for \$950 to pay for assorted muffins, coffee, tea and juice for the event. Candidate Baker does not wish to be reimbursed for the expense.

- 1. How should the committee disclose the first transaction (airline ticket)? Since the committee has not yet made the reimbursement, what issues must they consider when deciding how to disclose it?**

- 2. Is any additional disclosure necessary?**

- 3. How should the committee disclose the second transaction (office supplies)? Since it has been reimbursed by the end of the reporting period, do they need to disclose the advance and/or the reimbursement?**

- 4. Does the advance result in a contribution from Daniel Murphy? If so, does the resulting contribution need to be disclosed?**

- 5. How should the committee disclose the third transaction (unreimbursed expense paid by the candidate)?**

SCENARIO #6 Answers:

Scenario #6: Staff Advance - Travel

Bryce Harper, Campaign Manager for the Dusty Baker Campaign, used his personal credit card on 5/3/16, to purchase a \$550 airline ticket.

The committee will reimburse him, but not for at least 6 months, until more contributions for the primary election are received.



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1. **How should the committee disclose the first transaction (airline ticket)? Since the committee has not yet made the reimbursement, what issues must they consider when deciding how to disclose it?**

Answer: When a staff member advances funds in connection with travel expenses, no contribution results as long as the committee makes the reimbursement either within 30 days of when expenses were incurred (for advances by cash or check); or within 60 days of the closing date on the credit card billing statement (for advances by credit card. This is unlike a non-travel advance which is considered an in-kind contribution at the moment the individual advances the funds and counts towards the individual's limit until it is reimbursed.

Bryce Harper used a credit card for his travel, and since the campaign is not reimbursing him within the 60 day period of the credit card statement closing date, a contribution from Bryce results.

- **Report the advance as a contribution:** show reporting on Schedule A for Line 11(a)(i) and, since no money went into the campaign account, disclose as a MEMO entry (noted by checking the “Memo Item” box). The Date of Receipt is the date the funds are advanced (the date Bryce uses his credit card to purchase the ticket); also, include a notation indicating, “Travel advance to be reimbursed.”

See Reporting Example on Next Page

Scenario #6: Staff Advance - Travel

Report Advance - Form 3: Schedule A, Line 11(a)(i)

- Used for travel advances not reimbursed within 30 or 60 days

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE	OF
			<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c
			<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b
			<input type="checkbox"/> 14	<input type="checkbox"/> 15	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Dusty Baker for Congress Committee					
Full Name (Last, First, Middle Initial) A. Bryce Harper					
Mailing Address 1000 34th Street NW					
City Washington		State DC	Zip Code 20000		
FEC ID number of contributing federal political committee. C					
Name of Employer Dusty Baker Campaign		Occupation Communications Manager			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date 0.00			
		Date of Receipt 05 / 03 / 2016			
		Amount of Each Receipt this Period 550.00			
		<input checked="" type="checkbox"/> Memo Item Travel advance to be reimbursed			



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2. Is any additional disclosure necessary?

Answer: Yes. Until the campaign reimburses Bryce, it must disclose the outstanding advance as a debt. When the committee eventually pays off the advance/debt to the staff member, the payment should be reflected on Schedule D and as an operating expense on Schedule B for Line 17.

- Report Initial Debt:** show reporting on Schedule D for Line 10. Include a notation indicating, “travel advance – to be reimbursed.”

See Reporting Example on Next Page

Scenario #6: Staff Advance - Travel

Report Advance as Debt - Form 3: Schedule D, Line 10

- ☐ Used for Reporting as debt until reimbursed if >\$500 or outstanding > 60 days
- ☐ Advances not made and reimbursed within same reporting period

SCHEDULE D (FEC Form 3)		(Use separate schedule(s) for each numbered line)	PAGE 9 OF 10
DEBTS AND OBLIGATIONS		FOR LINE NUMBER: (check only one) <input checked="" type="checkbox"/> 9	
Excluding Loans			
NAME OF COMMITTEE (In Full) Dusty Baker for Congress Committee			
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor Bryce Harper		Nature of Debt (Purpose): Travel advance – To be reimbursed	
Mailing Address 1000 34th Street NW			
City	State	Zip Code	
Washington	DC	20000	
Outstanding Balance Beginning This Period 0.00			
Amount Incurred This Period 550.00	Payment This Period 0.00	Outstanding Balance at Close of This Period 550.00	



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- **Report Advance/Debt Payment:** On Schedule D for Line 10, show the payment amount in the field for “Payment this Period.” On Schedule B for Line 17 (Operating Expenditures), the payment should also be disclosed.

NOTE: If the total amount of the travel advance reimbursed to the staff member exceeded \$500 and payments to any one vendor used for the expenses totaled over \$200 for the election cycle, the payment to the vendor would need to be itemized as a MEMO entry (noted by checking the “Memo Item” box) linked to the staff member who was reimbursed.

See Reporting Example on Next Page

Scenario #6: Staff Advance - Travel

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)	PAGE OF
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer			
Full Name (Last, First, Middle Initial) A. Bryce Harper		Date of Disbursement 10 / 03 / 2016	
Mailing Address 1000 34th Street NW		Amount of Each Disbursement this Period 550.00	
City Washington State DC Zip Code 20000		<input type="checkbox"/> Memo Item	
Purpose of Disbursement Reimbursement for airline ticket		Category/ Type	
Candidate Name			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:			
Full Name (Last, First, Middle Initial) B. Skyway Airlines		Date of Disbursement 05 / 03 / 2016	
Mailing Address 301 Airport Way		Amount of Each Disbursement this Period 550.00	
City Arlington State VA Zip Code 20001		<input checked="" type="checkbox"/> Memo Item	
Purpose of Disbursement Airline ticket		Category/ Type	
Candidate Name			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:			

Report
Reimbursement

Form 3:
Schedule B,
Line 17



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Slide 65

Scenario #6: Staff Advance – Non-Travel

Another campaign volunteer, Daniel Murphy, wrote a personal check for \$750 on 4/20/16, to pay for office supplies at Staples.

He submitted the receipt to the committee treasurer that same day. The committee reimbursed him in full with campaign funds on 4/30/16.



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3. How should the committee disclose the second transaction (office supplies)? Since it was reimbursed by the end of the reporting period, do they need to disclose the advance and/or the reimbursement?

Answer: When a member of the campaign staff advances their own money to pay for a non-travel expense on behalf of the campaign, the advance is considered a contribution and counts against the individual's limit until reimbursed.

When the reimbursement is made in the same reporting period, if the total amount of the advance exceeds \$500, and payments to that person are over \$200 for the election cycle, then the committee must:

- 1) Report the staff member as payee, and
- 2) Itemize any payment aggregating over \$200 to any one vendor.

- **Report reimbursement to staff member:** show reporting on Schedule B for Line 17. The Date of Disbursement is the date the campaign reimburses the staff member.
- **Report itemization to vendor:** show reporting on Schedule B for Line 17 as MEMO entry (noted by checking the "Memo Item" box). The Date of Disbursement is the date the staff member pays the vendor (here, it is the date the check was written).

See Reporting Example on Next Page

Scenario #6: Staff Advance – Non-Travel

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)	PAGE	OF
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) Dusty Baker for Congress				
Full Name (Last, First, Middle Initial) A. Daniel Murphy		Date of Disbursement 04 / 30 / 2016		
Mailing Address 460 Nationals Ave NW		Amount of Each Disbursement this Period 750.00		
City Washington	State DC	Zip Code 20000	<input type="checkbox"/> Memo Item	
Purpose of Disbursement Reimbursement for office supplies		Category/Type		
Candidate Name				
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼			
State: District:				
Full Name (Last, First, Middle Initial) B. Staples		Date of Disbursement 04 / 20 / 2016		
Mailing Address 900 K Street NW		Amount of Each Disbursement this Period 750.00		
City Washington	State DC	Zip Code 20000	<input checked="" type="checkbox"/> Memo Item	
Purpose of Disbursement Office supplies		Category/Type		
Candidate Name				
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼			
State: District:				

**Form 3:
Schedule B,
Line 17**

**Made and
Reimbursed
in Same
Period**



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4. Does the advance result in a contribution from Daniel Murphy? If so, does the resulting contribution need to be disclosed?

Answer: Yes, until the advance is reimbursed. Any non-travel advance is considered an in-kind contribution at the time it is made – unlike a travel advance which only results in a contribution if it is not reimbursed within the appropriate timeframe. The advance affects contribution limits to the extent that the advance remains outstanding – any reimbursement made will reinstate the individual's limit accordingly.

For example, if Daniel Murphy had already contributed the full \$2,700 to the campaign for the primary, his \$750 payment for office supplies would have resulted in an excessive contribution at the moment the funds were advanced, even if the campaign reimbursed him an hour later and thus remedied the excessive contribution.

On the other hand, if the non-travel advance was the first time Daniel Murphy provided any monetary support to the campaign, the payment to Staples would have resulted in a \$750 in-kind contribution – decreasing the amount he could then contribute to, or advance on behalf of, the campaign to \$1,950 (while his reimbursement was outstanding). Once Daniel received his full \$750 reimbursement from the campaign, he could again contribute or advance up to the \$2,700 limit.

The original advance is reported as a contribution *only if* the total advanced from the staff member, minus any reimbursements made as of the end of the reporting period, aggregate over \$200 for the election cycle (i.e., previous contributions + the advance – the reimbursement > \$200). Since the amount outstanding to Daniel Murphy at the end of the reporting period is \$0, the advance is not disclosed as a contribution on Schedule A.

Scenario #6: Staff Advance - Unreimbursed

Candidate Dusty Baker is hosting a fundraising breakfast on 9/22/16. Instead of using the campaign credit card, Candidate Baker writes a \$950 personal check to Corner Bakery to pay for assorted muffins, coffee, tea and juice for the event.

Candidate Baker does not wish to be reimbursed.



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5. How should the committee disclose the third transaction (unreimbursed expense paid by the candidate)?

Answer: The Dusty Baker for Congress Committee must disclose disbursements from personal funds made by Candidate Baker on behalf of his committee, just as it would disclose any other disbursement that it makes. Since Candidate Baker is not seeking reimbursement, paying for the food for the fundraiser results in an in-kind contribution.

NOTE: In-kind contribution must be reported as a receipt (disclosed on Schedule A) and also a disbursement (disclosed on Schedule B as an operating expenditure) in order to avoid inflating the cash-on-hand.

Out of pocket spending by the candidate, as an agent of his authorized committee, requires memo entry itemization of the ultimate payee if the aggregate amount of payments to a vendor exceeds \$200 for the election cycle. Each memo entry must include the name and address of the vendor to which payment was made and the date, amount and purpose of the payment.

See *Interpretive Rule on Reporting Ultimate Payees of Political Committee Disbursements* at http://www.fec.gov/law/cfr/ej_compilation/2013/notice2013-09.pdf

- **Report out-of-pocket expense by candidate:** show reporting on Schedule A for Line 11(d) “Contributions from the Candidate.” Include notation indicating the contribution is “IN-KIND.”

Scenario #6: Staff Advance - Unreimbursed

Report Advance as a Contribution from the Candidate Form 3: Schedule A, Line 11(d)

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS		FOR LINE NUMBER: (check only one)	PAGE OF
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input checked="" type="checkbox"/> 11d	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input type="checkbox"/> 12 <input type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14 <input type="checkbox"/> 15	
NAME OF COMMITTEE (In Full) Dusty Baker for Congress			
Full Name (Last, First, Middle Initial) Dusty Baker		Date of Receipt 09 / 22 / 2016	
A. Mailing Address 101 12th Street		Amount of Each Receipt this Period 950.00	
City Washington		FEC ID number of contributing federal political committee. C	
State DC		Name of Employer Washington Nationals	
Zip Code 20000		Occupation Manager	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date 56,950.00	
		<input type="checkbox"/> Memo Item IN-KIND Food for Fundraising Breakfast	



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- **Report itemization to vendor:** show reporting on Schedule B for Line 17. Itemize vendor as MEMO entry (noted by checking the “Memo Item” box). The Date of Disbursement is the date the candidate pays the vendor (here, it is the date the check was written). Itemize candidate as source of advance and include notation indicating the contribution is “IN-KIND.”

See Reporting Example on Next Page

Scenario #6: Staff Advance - Unreimbursed

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)	PAGE OF
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input checked="" type="checkbox"/> 17	18 19a 19b
NAME OF COMMITTEE (In Full) Dusty Baker for Congress		<input type="checkbox"/> 20a	<input type="checkbox"/> 20b <input type="checkbox"/> 20c <input type="checkbox"/> 21
Full Name (Last, First, Middle Initial) A. Dusty Baker		Date of Disbursement 09 / 22 / 2016	
Mailing Address 101 12th Street		Amount of Each Disbursement this Period 950.00	
City Washington State DC Zip Code 20000		<input type="checkbox"/> Memo Item	
Purpose of Disbursement Food for Fundraising Breakfast 9/22/16		IN-KIND	
Candidate Name		Category/Type	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:			
Full Name (Last, First, Middle Initial) B. Corner Bakery		Date of Disbursement 09 / 22 / 2016	
Mailing Address 1401 Pennsylvania Avenue		Amount of Each Disbursement this Period 950.00	
City Washington State DC Zip Code 20000		<input checked="" type="checkbox"/> Memo Item	
Purpose of Disbursement Food for Fundraising Breakfast			
Candidate Name		Category/Type	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:			



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**Report
Disbursement
as an In-Kind
Contribution**

**Form 3:
Schedule B,
Line 17**

Key Issues:

- **Travel Advances:**
 - A travel advance is not considered a contribution if repaid within the appropriate timeframe:
 - Within 30 days from when the expense was incurred (for advances of cash or check); or
 - Within 60 days of the closing date on the credit card billing statement (for advances by credit card).
 - When a travel advance remains unpaid by the campaign committee outside the prescribed 30 or 60 day timeframe, it must be reported as BOTH a contribution and as a debt. Report as debt if the amount of the advance exceeds \$500, or has been outstanding for more than 60 days.
 - Remember since no money went into the campaign account as a result of the advance, use a MEMO entry (noted by checking the “Memo Item” box) for Schedule A.
 - Include notations on both Schedules A & D to cross-reference the transactions.

- **Non-Travel Advances:**

- A non-travel advance is considered a contribution at the moment the funds are advanced and counts against the contributor's limits until reimbursed.
- Only report the advance as a contribution, using a MEMO entry (noted by checking the "Memo Item" box) on Schedule A, if the amount of advanced funds outstanding (i.e., unreimbursed) for the staff member at the end of the reporting period > \$200 for the election cycle.
- When the amount of the advance reimbursement exceeds \$500, and payment to any one vendor exceeds \$200 for the election cycle, report the staff member as the payee using a disbursement entry on Schedule B for Line 17. In addition, itemize any vendor using a MEMO entry (noted by checking the "Memo Item" box) on Schedule B once payments to that vendor aggregate in excess of \$200 for the election cycle. Include notations as cross-references.
(**Note:** if each vendor payment making up the advance aggregates to less than \$200 for the election cycle, make a notation on Schedule B to that effect to avoid a Request for Additional Information from the FEC Reports Analysis Division.)

Objectives

- ▣ Review reporting schedule for 2016 and importance of timely filing
- ▣ Evaluate common reporting errors and disclosure scenarios
- ▣ **Learn about the review of reports and responding to Requests for Additional Information**
- ▣ Discuss best practices for reporting and compliance



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IV. RAD Review Process and Requests for Additional Information (RFAs)

Authorized Branch Analysts

- ▣ Each analyst is assigned 250-400 committees
- ▣ House and Senate campaigns assigned by state
- ▣ Presidential and Delegate committees are assigned to senior analysts
- ▣ Review electioneering communication and independent expenditure filings



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A. Organization of RAD

1. Three Branches

- a) **Authorized Branch** – reviews federal candidate committee reports – 15 analysts. New analysts undergo a 2 month training process and are then mentored by a more senior analyst for 6-12 months.
- b) **Party/Non-Party Branch** – reviews all party committee and PAC reports – 20 analysts. New analysts undergo a 4-5 month training process and are then mentored by a more senior analyst for 6-12 months.
- c) **Compliance Branch** – serves a quality control function for the review branches and implements the Non-Filer and Administrative Fine Programs – 4 analysts.
- d) Recently began cross training analysts to review reports filed by all committee/entity types.

2. Committee Assignments

- a) Authorized Branch analysts are assigned anywhere from 250 to 400 committees and filing entities (House, Senate, Presidential, Delegate, Joint Fundraising, Independent Expenditures and Electioneering Communications).
- b) House and Senate campaign committees are assigned by state.
- c) Presidential and Delegate committees are assigned to more senior analysts.
- d) All others are assigned randomly.

3. Analyst Responsibilities

- a) Review all reports filed by assigned committees by established deadlines.
- b) Customer service role – assist committees on the phone on a daily basis and log phone calls. Meet with Committees by request.
- c) Participate in FEC Conferences and Roundtables.
- d) Special Projects

RAD Review and Referral Policy

▣ Categories of review include:

- Mathematical discrepancies
- Failure to provide supporting schedules
- Failure to properly itemize contributions from individuals
- Prohibited, excessive and impermissible contributions
- Improper itemization of disbursements

▣ RFAI threshold

▣ Thresholds are confidential and policy is approved by the Commission



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B. RAD Review of Reports

1. RAD Review and Referral Policy

Policy is reassessed every election cycle and revisions/changes made based on input from RAD and other offices (such as OGC), and Commissioners. A redacted version of the RAD Review and Referral Policy can be found on the RAD web page.

2. Categories of Review

- a) Internal policy contains categories of review the analyst checks, such as: Prohibited, Excessive and Impermissible Contributions, Mathematical Discrepancies, Failure to Provide Supporting Schedules and Failure to Properly Itemize Contributions from Individuals and Disbursements, to name a few.
- b) Policy has established thresholds for making determinations on whether to send a Request for Additional Information (RFAI).
- c) Thresholds are confidential.

Review of Reports

- ▣ Thresholds are applied on a per report basis.
 - If reoccurring reporting issues exist on multiple reports, committee may receive multiple RFAIs on same issue
 - RAD does not consider previous responses to RFAIs, except responses apply for the two year election cycle for:
 - Best efforts procedures; and
 - Foreign address inquiries that indicate safe harbor guidelines are followed for all contributions
- ▣ It's possible to see an issue questioned on one report, but not on another



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3. **Review is conducted and thresholds are applied on a per report basis, meaning the thresholds are applied to each report reviewed.**
- a) This means a committee may receive a RFAI identifying the same issue already addressed in response to a RFAI referencing a different report.
 - b) Exceptions include outlining Best Efforts procedures which would apply to the two-year cycle, and responses relating to foreign address inquiries that indicate safe harbor guidelines are followed for all contributions apply for the two-year election cycle.
 - c) There may be several issues that are aggregated together to meet a single threshold, so it's possible to see an issue questioned on one report that isn't included in an RFAI on for another report.

Request for Additional Info

- ▣ If internal thresholds are met:
 - Analyst sends RFAI with response due date in upper right corner
- ▣ No extensions
- ▣ Responses assessed by analysts, team leaders
- ▣ Analysts do not reply to committee responses



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C. Request for Additional Information

1. If internal thresholds are met, an RFAI is sent, with a Response Due Date in the upper right hand corner of the letter. Extensions are not granted. The committee analyst's name and contact telephone number are also provided in the letter.

Tip: You can find out who your analyst is by visiting:
<http://www.fec.gov/rad/index.shtml>.

RFAs via Email

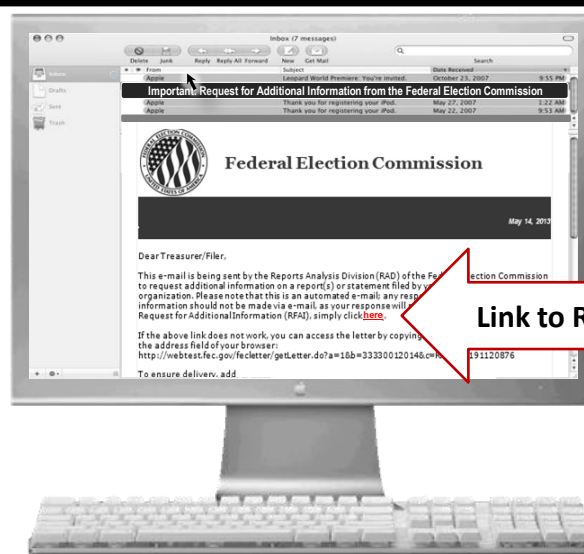
- ❑ RAD is now emailing RFAs to email address on Form 1 (Statement of Organization).
 - Opt-Out Option: File a Form 99 to request that RFAs be mailed via USPS.
- ❑ Committees can now list up to two email addresses on Form 1.
- ❑ Ensure current contact information (mailing address, email address, and phone number) appear on FEC Form 1.



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RFAs via Email

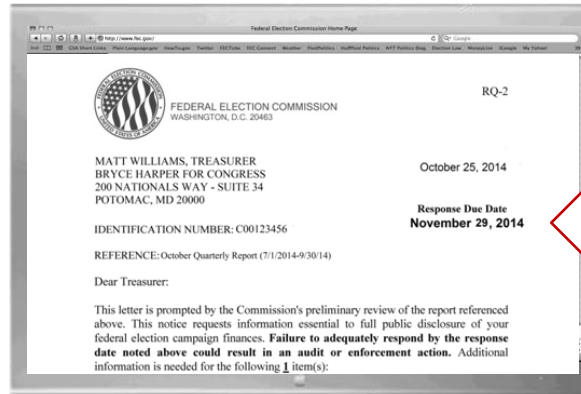


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RFAIs via Email

Request for
Additional Info



Response
Due Date

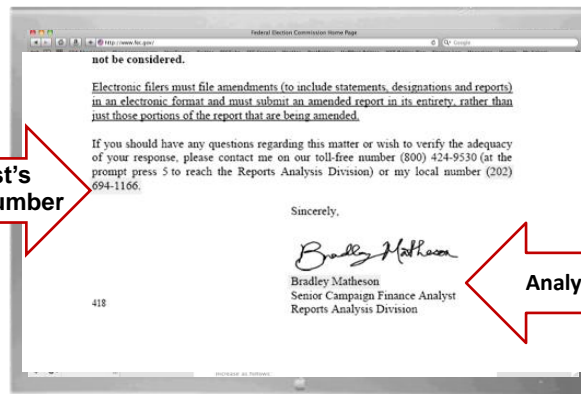


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RFAIs via Email

Request for
Additional Info



Analyst's
Phone Number

Analyst's Name



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Responding to RFAIs

- ▣ Analysts do not contact committees in every case when a response is not sufficient
- ▣ Committee should contact its analyst before and/or after filing a response
- ▣ Analysts do not make legal conclusions
- ▣ Analysts cannot categorize your activity
- ▣ In some cases, RAD consults OGC before sending an RFAI and when assessing a committee's response



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2. Responses are assessed by the analysts and in some cases, team leaders.

- a) Analysts do not reply to responses.
- b) Contact is not made with committees in every case when a response is not sufficient. Further explanation below.
- c) Committees are encouraged to contact their assigned analyst prior to responding if unsure about how to respond or after a response is filed to ensure an adequate response is received.
- d) Keep in mind that analysts can't make legal conclusions or give guidance on a legal conclusion being made by a committee. In addition, they cannot determine what category your activity falls under (i.e., independent expenditures or coordinated party expenditures).
- e) In some cases, RAD consults with OGC before sending a RFAI and when making a response assessment.

Responding to RFAs

- ▣ File amendment to:
Add, Change or Delete actual entries on
FEC report
- ▣ Use miscellaneous text submission
(Form 99) for:
Narrative responses that do not affect actual
entries within a report
(e.g., demonstrating best efforts, demonstrating
safe harbor guidelines are followed for all
contributions with a foreign address)



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3. **Best way to respond to RFAs depends on type of information that needs to be provided.**
 - a) File an **amendment to a report** when changing information that affects entries on a report. This would include additions, changes or deletions.
 - b) File a **Miscellaneous Text Submission (Form 99)** for narrative responses that do not affect actual entries within a report. (For example, when outlining procedures for “Best Efforts” in obtaining contributor information.)

Audit Consideration Factors

- ▣ Level of financial activity
- ▣ Responses to RFAs
 - ✓ Late or no response
 - ✓ Inadequate response
- ▣ Number of amendments filed is NOT a factor
- ▣ Election results (Authorized committees only)
- ▣ Number of RFAs received is NOT a factor if responses were adequate and timely



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D. Referrals to the Audit Division

1. Factors for making referrals to the Audit Division
 - a) Level of financial activity
 - b) Responses to RFAs
 - i. Late or no response
 - ii. Inadequate responses
 - c) **For Authorized Committees only** - Election Results
2. The number of amendments filed is not a factor.
3. The number of RFAs is not a factor if responded to adequately and on time.
4. Committees should ensure that they have provided the most current mailing address, email address and phone numbers on their Statement of Organization (FEC Form 1). Often RFAs are returned by the Post Office due to an incorrect mailing address. In addition, RAD began sending RFAs via email in October 2011, so it's important to ensure a valid email address is provided on FEC Form 1. Committees have the option to instead receive RFAs on paper through the mail and can indicate this preference by filing Form 99.

Objectives

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V. FEC Best Practices for Reporting and Compliance Resources

Avoid Common Mistakes

- ▣ Check for math errors
- ▣ Include all required schedules, all information
- ▣ Provide all information required by schedule
- ▣ Consult form instructions available on FEC.gov
- ▣ Designate contributions
- ▣ Only enter contributors into reporting software once to avoid aggregation problems
- ▣ Ensure correct committee name disclosed for contributions made/received



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Contact Information

- ▣ Ensure current contact information (mailing address, email address, and phone number) appear on Statement of Organization (FEC Form 1)
- ▣ Up to two email addresses may be listed



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FEC Resources

- ▣ Website: www.fec.gov ; see Reports Analysis FAQs at <http://www.fec.gov/rad/index.shtml>
- ▣ Toll-free Information Line: (800) 424-9530
- ▣ Email questions to info@fec.gov
- ▣ Educational Outreach:
 - Conferences/Seminars:
<http://www.fec.gov/info/outreach.shtml>
Email: conferences@fec.gov
 - Roundtable Workshops & Webinars
 - E-Learning at fec.gov/info/elearning.shtml



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RAD FAQs Web Page



<http://www.fec.gov/rad/index.shtml>



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Workshop Evaluation

Help Us Help You!

Please complete an evaluation
of this workshop

<https://www.surveymonkey.com/r/FKFMW5X>



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